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November 30, 2001

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals/445 Twelfth Street, S.W.
Washington, D.C. 20554

VIA UPS OVERNIGHT

RECEIVED

DEC - 5 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Petition for Rulemaking (Channel 253C-1), Bend, Oregon

Dear Ms. Salas:

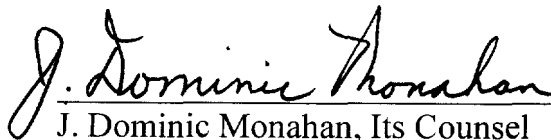
There is transmitted herewith on behalf of Combined Communications, Inc., the licensee of Station KTWS(AM), Bend, Oregon, an original and four copies of a *Petition for Rulemaking* to institute a rulemaking to amend §73.202(b), the FM Table of Allocations, by substituting Channel 253C-1 to Bend, Oregon in place of Channel 252C-3. The petition also requests a substitution of Channel 271C-3 to Prineville, Oregon in lieu of Channel 254C-3.

An extra copy of this transmittal letter is enclosed, as well as a pre-addressed, stamped envelope. Please confirm your receipt of the filing of this *Petition for Rulemaking* by date stamping the extra copy of this transmittal letter and returning it to the undersigned counsel.

Should additional information be desired concerning this *Petition for Rulemaking* please contact the undersigned counsel.

Respectfully submitted,

COMBINED COMMUNICATIONS, INC.


J. Dominic Monahan, Its Counsel

JDM/nlk

Enclosures

cc: Charles Chackel (w/enclosure)
Mike Cheney (w/enclosure)

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MMB
01-433

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

DEC - 5 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of) RM-_____
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
Bend, Oregon and Prineville, Oregon)

TO: Chief, Allocations Branch

PETITION FOR RULEMAKING

Combined Communications, Inc. ("Combined") respectfully requests the Commission institute a rulemaking for the allocation of Channel 253C-1 to Bend, Oregon in substitution of Channel 252C-3. Combined also requests that the Commission substitute Channel 271C-3 to Prineville, Oregon in substitution of Channel 254C-3 which is presently allocated to that community. In support, the following is shown.

Combined presently is licensed to operate Station KTWS(FM) in Bend, Oregon on Channel 252C-3. This allotment for Station KTWS was recently modified pursuant to the *Report and Order* in MM Docket No. 00-87 wherein Channel 253C-3 was substituted for Channel 252C-3 in order to accommodate the "drop-in" allotment of Channel 251C-1 to Madras, Oregon. The same *Report and Order* substituted Channel 255C-3 in Prineville for the vacant allotment on Channel 254C-3. Thus, the instant

rulemaking petition requests a further modification of both of the allotment changes made in MM Docket No. 00-87.

Specifically, Combined seeks to have the Commission substitute Channel 253C-1 for Channel 253C-3 and to modify the license of Station KTWS to specify operation on the new channel. It also requests the simultaneous substitution of Channel 271C-3 for the vacant and unapplied-for Channel 255C-3 allocated to Prineville, Oregon. The public interest will be served by these changes as it will provide Station KTWS the ability to upgrade from a Class C-2 station to a Class C-1 facility while providing additional aural service to 29,709 persons. The proposal will also provide additional service to 104 presently under-served individuals. No white area will be created by the proposed channel substitution. To the extent a very small gray area will be created, that area is unpopulated (*see* attached Engineering Exhibit)..

The allocation of Channel 253C-1 to Bend, Oregon complies with all applicable Commission rules and regulations concerning separation among FM allotments as well as city coverage. Similarly, the allocation of Channel 271C-3 at Prineville meets all Commission separation requirements as well as coverage requirements to the community of Prineville. No loss area will be created in association with the Channel 253C-1 upgrade in Bend, and in fact, will provide additional aural service to almost 30,000 persons.

Prineville's substitution will require an allotment site change. Accordingly, there will be a loss area encompassing 1,064 kilometers and a population of 53,338 persons.

However, the current allotment to Prineville is neither an operating station nor has application been submitted for this channel. Thus, no actual loss of service is associated with the proposal. Moreover, these areas are either abundantly served by an existing service or, in the case of the small white areas, does not include any population (*see attached Engineering Exhibit*).

At such time as the Commission completes the requested institution of allotments in Bend and Prineville, Oregon, Combined will immediately undertake all necessary steps and applications to implement the Channel 253C-1 upgrade in Bend, Oregon

Respectfully submitted,

COMBINED COMMUNICATIONS, INC.


J. Dominic Monahan, Its Counsel

November 30, 2001

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ENGINEERING STATEMENT

**PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION**

**TO ASSIGN FM CHANNEL 253C1
FOR USE AT BEND, OREGON**

**TO ASSIGN FM CHANNEL 271C3
FOR USE AT PRINEVILLE, OREGON**

COMBINED COMMUNICATIONS, INC.

11/2001

Engineering Statement

This Engineering Statement has been prepared on behalf of Combined Communications, Inc. ("Combined"), licensee of FM station KTWS Channel 253C3¹ Bend, Oregon, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. Combined requests that the Commission:

- 1) Substitute Channel 253C1 for Channel 253C3 at Bend, Oregon, and modify the license of station KTWS to specify operation on the new channel, and;
- 2) Substitute Channel 271C3 for vacant and unapplied-for Channel 255C3 at Prineville, Oregon.

The proposed reallocation plan will provide several benefits:

- 1) KTWS will be able to upgrade to Class C1, and thus will be able to provide enhanced service to Bend and a broader listening area.
- 2) A total of 29,709 persons will receive at least one additional aural service.
- 3) 104 presently underserved persons will receive an additional aural service.
- 4) In accommodating the benefits listed above, no white areas will be created. One small gray area will be created, but that area is unpopulated.

¹KTWS presently operates at Bend on Channel 252C3. However, per the recently-issued Report and Order in MM Docket No. 00-87, the KTWS allotment has been modified to Channel 253C3, in order to accommodate the "drop in" allotment of Channel 251C1 at Madras. That same Report and Order modified the vacant Prineville allotment from Channel 254C3 to Channel 255C3.

Channel 253C1 at Bend

As outlined in the attached channel study, Channel 253C1 can be assigned for use at Bend in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 271C3 is substituted for Channel 255C3 at Prineville. For this study the coordinates of the licensed KTWS operation on Awbrey Butte (NL 44° 04' 41" x WL 121° 19' 57") have been used. This site is within the City of Bend, the reference coordinates of which are NL 44° 03' 30" x WL 121° 18' 51". The nominal distance to the 70 dBu F(50,50) contour for a Class C1 station is 50 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Bend.

Channel 271C3 at Prineville

As outlined in the attached channel study, Channel 271C3 can be substituted for vacant and unapplied-for Channel 255C3 at Prineville² in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of the least-restricted fully-spaced site (NL 44° 20' 36" x WL 120° 44' 06") have been used. This site is 9 kilometers from Prineville, the coordinates of which are NL 44° 18' 00" x WL 120° 50' 00". The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Prineville.

²The Prineville allotment is slated to be included in FM Auction #37, the date of which has been delayed indefinitely.

Gain and Loss Areas

The 60 dBu contour of Channel 253C1 at Bend completely encompasses the 60 dBu contour of the present Channel 253C3 operation at Bend. Therefore, there will be no loss areas directly associated with that upgrade. The gain area directly associated with the upgrade at Bend encompasses 11,504 km² and a population of 29,649 persons.

The substitution of Channel 271C3 for Channel 255C3 at Prineville will involve an allotment site change. The gain area directly associated with the change at Prineville will encompass 1,064 km² and a population of 228 persons. The loss area will encompass 1,064 km² and a population of 5,338 persons. It should be noted that since Prineville is not an operating station, there will be no actual loss of service associated with this change.

The upgrade at Bend will provide 60 dBu service to most of the Prineville loss area. Taken as a whole, the proposed reallocation plan will result in the following gain and loss areas:

Service Change	Area and Population	
1 Lost	616 km ²	5,313 persons
1 Gained	11,504 km ²	29,564 persons
2 Gained	308 km ²	145 persons

The proposed reallocation plan will result in the creation of two discrete loss areas. Loss area "A" is considered well-served. Each of the following stations provides 60 dBu service to 100% of loss area "A".³

KOAB(FM)	217C2 Bend, OR
KXIX(FM)	231C Bend, OR
KMJZ(FM)	236C1 Prineville, OR
KNLR(FM)	248C1 Bend, OR
KMTK(FM)	259C2 Bend, OR
KMGX(FM)	264C1 Bend, OR
KLRR(FM)	268C2 Redmond, OR
KSJJ(FM)	275C1 Redmond, OR
KWPK(FM)	281C2 Sisters, OR
KQAK(FM)	289C1 Bend, OR

Loss area "B" will be left with only one aural service, from KMJZ(FM) 236C1 Prineville, but is unpopulated.

The proposed reallocation plan will not provide new service to any white areas. Additional service will be provided to some presently underserved areas, including an unpopulated gray area:

³In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour.

Existing Services	Area and Population	
1	19 km ²	zero persons
2	119 km ²	zero persons
3	535 km ²	33 persons
4	679 km ²	71 persons

The following facilities provide service to all or a portion of the gain area:

KWRX(FM)	203C3 Redmond, OR
KLCC(FM)	209C Eugene, OR
KOAB(FM)	217C2 Bend, OR
KWSO(FM)	220C2 Warm Springs, OR
KAVE(FM)	221A Oakridge, OR
KKNU(FM)	226C Springfield-Eugene, OR
KXIX(FM)	231C Bend, OR
KMGE(FM)	233C1 Eugene, OR
KMJZ(FM)	236C1 Prineville, OR
KZEL(FM)	241C Eugene, OR
KRCO(FM)	243C Warm Springs, OR
KNLR(FM)	248C1 Bend, OR
KNRQ(FM)	250C Eugene, OR
Vacant	251C1 Madras, OR
KODZ(FM)	256C Eugene, OR
KMTK(FM)	259C2 Bend, OR
KMGX(FM)	264C1 Bend, OR
KLRR(FM)	269C2 Redmond, OR
KEHK(FM)	272C1 Brownsville, OR
KSJJ(FM)	275C1 Redmond, OR
KXPC(FM)	279C Lebanon, OR
KWPK(FM)	281C2 Sisters, OR
KRSK(FM)	286C Molalla, OR
KQAK(FM)	289C1 Bend, OR
KLvu(FM)	296C1 Sweet Home, OR

No Tuck Analysis Required

Since 1) neither of the allotment changes requested in this petition involve the migration of a station from a rural area to an urban area, 2) no changes in communities of license are

proposed, and 3) neither allotment will provide 70 dBu service to any Urbanized Area, no "Tuck" analysis is believed to be required in support of the proposed reallocation plan.

Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Bend and Prineville, Oregon, has been prepared on behalf of Combined Communications, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 15th day of November, 2001



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

FM Database Date: 011107

Page 1

Channel: 253C1 98.5 MHz
 Latitude: 44 4 41
 Longitude: 121 19 57
 Safety Zone: 50 km
 Job Title: BEND 253C1 (KTWS)

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KNRQ-FM LIC	EUGENE OR	BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50	267.2	143.03 38.03	105 CLEAR
ADD	MADRAS OR	RM-9961	251C1 98.1	0.000 0.0	44-50-02 120-45-55	28.0	95.35 13.35	82 CLEAR
KTWS LIC	BEND OR	BLH-950629KC	252C3 98.3	6.800 191.0	44-04-41 121-19-57	0.0	0.00 -144.00	144 SHORT
NOTE: TO CHANNEL 253C3 PER MM DOC 00-87								
KTWS DELETE	BEND OR	RM-9961	252C3 98.3	0.000 0.0	44-04-41 121-19-57	0.0	0.00 -144.00	144 SHORT
NOTE: TO CHANNEL 253C3 PER MM DOC 00-87								
VACANT	DALLAS OR	-	252C3 98.3	0.000 0.0	44-55-06 123-19-00	301.4	183.36 39.36	144 CLEAR
KTWS ADD	BEND OR	RM-9961	253C3 98.5	0.000 0.0	44-04-41 121-19-57	0.0	0.00 -211.00	211 SHORT
NOTE: FROM CHANNEL 253C3 PER MM DOC 00-87								
NEW APP	EUGENE OR	BNPL-010615ALN	253L1 98.5	0.000 0.0	44-04-18 123-08-01	270.3	144.28 0.00	0 LPFM
950206MBKENO APP	OR	BPED-950206MB	253A 98.5	0.220 507.0	42-04-38 121-58-20	193.4	228.30 28.30	200 CLEAR
950206MBKENO APP	OR	BPED-950206MB	253A 98.5	1.450 200.0	42-13-23 121-49-03	191.0	209.82 9.82	200 CLOSE
950206MHKENO VACANT	OR	-	253A 98.5	0.000 0.0	42-07-30 121-55-42	192.8	222.33 22.33	200 CLEAR
950206MHKENO APP	OR	BPED-950206MH	253A 98.5	6.000 88.0	42-08-43 121-46-15	189.6	217.66 17.66	200 CLEAR
950206MHKENO ADD	OR	-	254C1 98.7	0.000 0.0	42-07-30 121-55-42	192.8	222.33 45.33	177 CLEAR
950206MHKENO APP	OR	BPED-950206MH	254C1 98.7	52.000 212.0	42-13-23 121-49-03	191.0	209.82 32.82	177 CLEAR

SEARCH PARAMETERS

FM Database Date: 011107

Channel: 253C1 98.5 MHz

Page 2

Latitude: 44 4 41

Longitude: 121 19 57

Safety Zone: 50 km

Job Title: BEND 253C1 (KTWS)

Call Status	City St	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
950206MHK	ENO		254C1	16.000	42-05-43	193.9	226.72	177
APP	OR	BPED-950206MH	98.7	587.0	121-59-31	SS	49.72	CLEAR
950206MBK	ENO		254C1	52.000	42-13-23	191.0	209.82	177
APP	OR	BPED-950206MB	98.7	212.0	121-49-03		32.82	CLEAR
KUPL-FM	PORTLAND		254C1	37.000	45-30-58	325.8	194.47	177
LIC	OR	BLH-970915KD	98.7	440.0	122-43-59		17.47	CLEAR
KUPLaux	PORTLAND		254C1	16.000	45-27-13	328.4	180.54	0
LIC	OR	BXMLH-000316ABX	98.7	337.0	122-32-45		0.00	AUX
KUPLaux	PORTLAND		254C1	37.000	45-30-57	325.9	194.36	0
CP	OR	BXPB-970219ID	98.7	362.0	122-43-52		0.00	AUX
	PRINEVILLE		254C3	0.000	44-13-30	69.6	47.50	144
VACANT	OR	-	98.7	0.0	120-46-30		-96.50	SHORT
NOTE: TO CHANNEL 255C3 PER MM DOC 00-87								
	PRINEVILLE		254C3	0.000	44-13-30	69.6	47.50	144
DELETE	OR	RM-9961	98.7	0.0	120-46-30		-96.50	SHORT
NOTE: TO CHANNEL 255C3 PER MM DOC 00-87								
	PRINEVILLE		255C3	0.000	44-13-30	69.6	47.50	76
ADD	OR	RM-9961	98.9	0.0	120-46-30		-28.50	SHORT
NOTE: FROM CHANNEL 254C3 PER MM DOC 00-87; TO CHANNEL 271C3 PER THIS PETITION								
KODZ	EUGENE		256C	100.000	44-06-56	272.4	133.51	105
LIC	OR	BLH-840409BY	99.1	497.0	122-59-56		28.51	CLEAR

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KTWS	BEND		253C1	0.000	44-04-41	0.0	0.00	245
VAC	OR	-	98.5	0.0	121-19-57		-245.00	SHORT
NOTE: FROM CHANNEL 253C3 PER THIS PETITION								

===== END OF FM SPACING STUDY FOR CHANNEL 253 =====

SEARCH PARAMETERS

FM Database Date: 011107

Channel: 271C3 102.1 MHz
 Latitude: 44 20 36
 Longitude: 120 44 6
 Safety Zone: 50 km
 Job Title: PRINEVILLE 271C3

Page 1

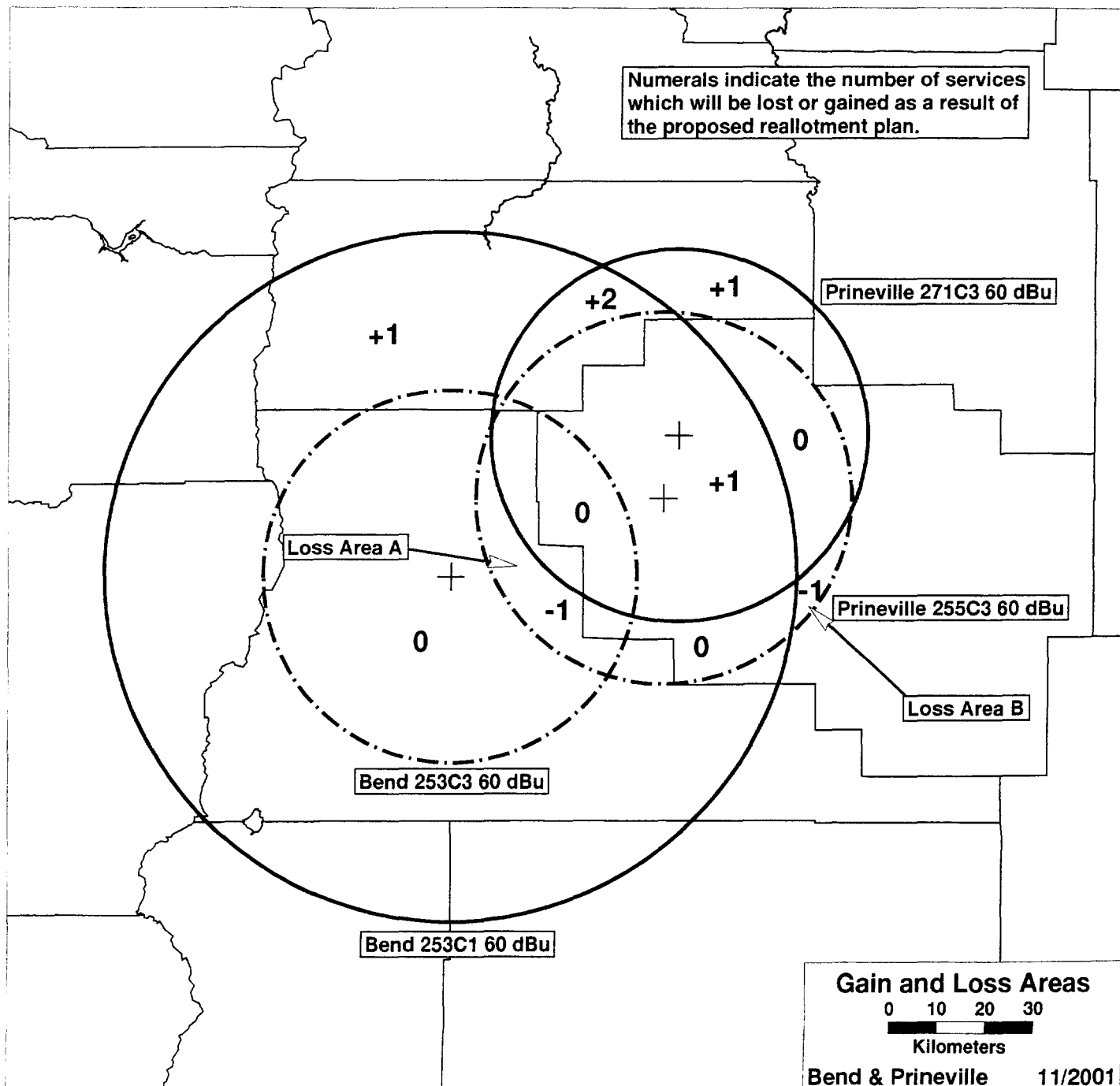
Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KOAB-FM LIC	BEND OR	BLED-860128KC	217C2 91.3	25.000 184.0	44-04-41 121-19-57	238.4	56.12 39.12	17 CLEAR
K269DK LIC	PRINEVILLE, ETC. OR	BLFT-860811TA	269D 101.7	0.070 DA 721.0	44-25-03 121-06-01	286.0	30.25 0.00	0 TRANS
KLRR ADD	REDMOND OR	RM-8732	269C2 101.7	0.000 0.0	44-04-41 121-19-57	238.4	56.12 0.12	56 CLOSE
KLRR VACANT	REDMOND OR	-	269C2 101.7	0.000 0.0	44-04-41 121-19-57	238.4	56.12 0.12	56 CLOSE
KINK LIC	PORTLAND OR	BLH-000524ABC	270C 101.9	100.000 470.0	45-31-21 122-44-45	310.3	205.84 29.84	176 CLEAR
NEW APP	MADRAS OR	BNPL-010615BDC	271L1 102.1	0.000 0.0	44-37-59 121-07-48	315.9	44.99 0.00	0 LPFM
KEHK LIC	BROWNSVILLE OR	BLH-940919KA	272C1 102.3	100.000 280.0	44-00-08 123-06-50	259.5	193.99 49.99	144 CLEAR
KYYT LIC	GOLDENDALE WA	BLH-990318KD	272C2 102.3	2.100 DA 571.0	45-40-53 120-54-30	354.8 SS	149.33 32.33	117 CLEAR

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

None	PRINEVILLE	271C3	0.000	44-20-36	0.0	0.00	153
VAC	OR -	102.1	0.0	120-44-06		-153.00	SHORT

NOTE: FROM CHANNEL 254C3 PER THIS PETITION

===== END OF FM SPACING STUDY FOR CHANNEL 271 =====



Shading indicates presently underserved areas which will receive additional service as a result of the proposed reallocation plan.

